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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	2:12-cr-00268-JAD-CWH
)	
Plaintiff,)	
)	
v.)	STIPULATION FOR PROTECTIVE
)	ORDER
YOUNG HIE CHOI,)	
a.k.a. Lianyu Li,)	
)	
PAUL CHOI,)	
a.k.a. Chunai Li, and)	
)	
IN SEON SEONG,)	
a.k.a. Hong Shan Jin)	
)	
Defendants.)	
_____)	

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States, Kathleen Bliss, Esq. and Paul Padda, Esq., counsel for defendant YOUNG HIE CHOI, Chris Rasmussen, Esq., counsel for defendant counsel for defendant PAUL CHOI, Assistant Federal Public Defender Raquel Lazo, counsel for defendant IN SEON SEONG, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers' license numbers, dates of birth, or addresses, of participants, witnesses

1 and victims in this case. Such documents shall be referred to hereinafter as “Protected
2 Documents.” The parties state as follows:

3 1. Protected Documents which will be used by the government in its case in chief
4 include personal identifiers, including social security numbers, drivers’ license numbers, dates of
5 birth, and addresses, of participants, witnesses, and victims in this case.

6 2. Discovery in this case is estimated to be more than thirteen thousand pages in
7 length. Given the nature of the allegations and the facts and circumstances surrounding the
8 crimes with which the defendants are charged, that is, that the defendants assumed identities of
9 persons other than themselves, and obtained identity documents bearing the defendants’
10 photograph in the victims’ names and personal identifiers, many of the documents in the
11 discovery necessarily include personal identifiers. Redacting the personal identifiers of
12 participants, witnesses, and victims would prevent the timely disclosure of discovery to
13 defendant.

14 3. The United States agrees to provide Protected Documents without redacting the
15 personal identifiers of participants, witnesses, and victims.

16 4. Access to Protected Documents will be restricted to persons authorized by the
17 Court, namely defendants, attorneys of record and attorneys’ paralegals, investigators, experts,
18 and secretaries employed by the attorneys of record and performing on behalf of defendant.

19 5. The following restrictions will be placed on defendant, defendants’ attorneys and
20 the above-designated individuals unless and until further ordered by the Court. Defendants,
21 defendants’ attorneys and the above-designated individuals shall not:

22 a. make copies for, or allow copies of any kind to be made by any other person of
23 Protected Documents;

1 b. allow any other person to read Protected Documents; and

2 c. use Protected Documents for any other purpose other than preparing to defend
3 against the charges in the Indictment or any further superseding indictment arising out of this
4 case.

5 6. Defendants' attorneys shall inform any person to whom disclosure may be made
6 pursuant to this order of the existence and terms of this Court's order.

7 7. The requested restrictions shall not restrict the use or introduction as evidence of
8 discovery documents containing personal identifying information such as social security
9 numbers, drivers' license numbers, dates of birth, and addresses during the trial of this matter.

10 8. Upon conclusion of this action, defendants' attorneys shall return to government
11 counsel or destroy and certify to government counsel the destruction of all discovery documents
12 containing personal identifying information such as social security numbers, drivers' license
13 numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after
14 the last appeal is final.

15 DANIEL G. BOGDEN
16 United States Attorney

17 /s/Kimberly M. Frayn
18 KIMBERLY M. FRAYN
19 Assistant United States Attorney

December 31, 2015
DATE

19 /s/Kathleen Bliss, Esq.
20 KATHLEEN BLISS, ESQ.
21 Counsel for defendant Young Choi

December 31, 2015
DATE

21 /s/Paul Padda, Esq.
22 PAUL PADDA, ESQ.
23 Counsel for defendant Young Choi

December 30, 2015
DATE

